

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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NOVARTIS PHARMACEUTICALS	)	
CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ACTAVIS LLC; APOTEX, INC.;	)	Civil Action No. 13-1028 (SDW) (MCA)
APOTEX, CORP.; GLAND PHARMA	)	
LTD.; DR. REDDY'S LABORATORIES,	)	
INC.; DR. REDDY'S LABORATORIES	)	<b>Motion Day: June 17, 2013</b>
LTD.; EMCURE PHARMACEUTICALS	)	
USA, INC.; EMCURE	)	
PHARMACEUTICALS, LTD; HOSPIRA,	)	
INC.; PHARMACEUTICS	)	
INTERNATIONAL INC.; SAGENT	)	
PHARMACEUTICALS, INC.; ACS	)	
DOBFAR INFO S.A.; STRIDES, INC.;	)	
AGILA SPECIALTIES PRIVATE LTD.;	)	
SUN PHARMA GLOBAL FZE;	)	
CARACO PHARMACEUTICAL	)	
LABORATORIES, LTD; SUN	)	
PHARMACEUTICAL INDUSTRIES	)	
LTD.; WOCKHARDT USA LLC; and	)	
WOCKHARDT LTD.	)	
	)	
Defendants.	)	
	)	

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NOVARTIS'S NOTICE OF MOTION TO SEAL

**PLEASE TAKE NOTICE** that on June 17, 2013, or as soon as counsel can be heard, the undersigned counsel for Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) shall move pursuant to Local Civil Rule 5.3(c) before the Honorable Madeline Cox Arleo, U.S.M.J., at the United States District Court for the District of New Jersey, for an Order sealing the following documents [D.I. 232]:

- 1) Portions of Novartis’s Opposition to Wockhardt’s Motion to Dismiss Count II of the Corrected Amended Complaint; and
- 2) Exhibits 1 and 2 to the Declaration of Robert W. Trenchard in Support of Novartis’s Opposition to Wockhardt’s Motion to Dismiss Count II of the Corrected Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff submits a publicly redacted version of Novartis’s Opposition to Wockhardt’s Motion to Dismiss Count II of the Corrected Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff submits a public version of the Declaration of Robert W. Trenchard in Support of Novartis’s Opposition to Wockhardt’s Motion to Dismiss Count II of the Corrected Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff submits the enclosed Memorandum in Support of this Motion to Seal, pursuant to Local Civil Rules 5.3(c)(1) and 7.1, and the Certification of Rachel L. Weiner attesting to the good cause for an Order sealing the above-referenced documents.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion to Seal, Memorandum and Certification of Rachel L. Weiner, and any additional submissions made hereafter, a proposed Order is also submitted.

DATED: May 14, 2013

s/ William J. O'Shaughnessy  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that true copies of the foregoing Notice of Motion to Seal and supporting documents were caused to be served on May 14, 2013 via email and/or the ECF system upon all counsel of record.

By: *s/ William J. O'Shaughnessy*  
William J. O'Shaughnessy